

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-MJ-8561-WM

UNITED STATES OF AMERICA

vs.

DANIEL CLARK,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)?
_____ Yes X No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? _____ Yes X No

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By: Lara Treinis Gatz
Lara Treinis Gatz
Assistant United States Attorney
Southern District of Florida
Court ID No. A5502857
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida



United States of America

v.

DANIEL CLARK,

Case No.

22-MJ-8561-WM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2021 and the present in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 846
 21 USC 841(a)(1)

Conspiracy to possess and distribution of fentanyl, cocaine and other
 Schedule I, II, IV and V Controlled Substances

FILED BY SW D.C.**Dec 5, 2022**

ANGELA E. NOBLE
 CLERK U.S. DIST. CT.
 S. D. OF FLA. - WPB

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*Complainant's signature*

TFO BARRY O. KOPPLIN

Printed name and title

Sworn and Attested to me by Applicant by Telephone-Facetime per FRCP 4.1.

Date: 12/05/2022*Judge's signature*City and state: West Palm Beach, Florida

WILLIAM MATTHEWMAN, USMJ

Printed name and title

LTG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

----- X
UNITED STATES OF AMERICA

- against -

DANIEL CLARK,

Defendant.
----- X

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT

Case No. 22-mj-8561-WM

I, BARRY O. KOPPLIN, being duly sworn, deposes and states:

1. I am a Task Force Officer with the United States Drug Enforcement Administration ("DEA"). In my current assignment I investigate all aspects of the importation, manufacture, and distribution of illegal drugs.

2. The facts in this Affidavit come from my personal observations, training, experience, and information obtained from other law enforcement officers, witnesses, documents, and law enforcement databases. Because this Affidavit is being submitted for the limited purpose of establishing probable cause in support of this criminal Complaint, it does not include all facts known to me or to other law enforcement officers regarding this investigation.

PROBABLE CAUSE

3. On or about September 22, 2022, a Task Force Officer (the "TFO") working with the United States Postal Inspection Service (USPIS) was conducting proactive law enforcement searches in a USPIS databases, and identified the address 5154 SW 88th Terrace, Gainesville, FL, 32608, (the "PREMISES"), as a location at which suspicious parcels were being received. Indeed, the TFO reviewed information concerning fifty-five priority mail

parcels (collectively the "55 PARCELS") that were sent to the PREMISES between July 18, 2022, and September 22, 2022, addressed to the defendant DANIEL CLARK.

4. Upon further investigation, the TFO learned that on June 30, 2021, agents with Homeland Security Investigations (HSI) intercepted an international parcel from India addressed to "Daniel Clark" at "118 North Ohio Avenue, Unit #120, Live Oak, FL, 32064 (the "INDIA PARCEL") which is a UPS Store location (the "UPS Store"). The INDIA PARCEL contained Carisoprodol (a schedule IV-controlled substance). Further investigation revealed that, prior to the June 30, 2021 seizure, an individual named DANIEL CLARK opened a UPS Box at the UPS Store utilizing Florida Driver's License # C462170801720 in the name DANIEL CLARK, which contained CLARK's picture. In total, between June 30, 2021 and July 26, 2021, law enforcement officers seized thirteen parcels addressed to CLARK at the UPS Store that contained controlled substances such as Carisoprodol (a schedule IV controlled substance), Pregabalin (a schedule V-controlled substance), Codamol (a schedule II-controlled substance), Rivotril (a schedule IV-controlled substance) and Tapentadol (a schedule II-controlled substance).

5. A review of DAVID, the Florida motor vehicle driver's license database, reveals that currently, DANIEL CLARK, Florida Driver's License # C462170801720, lives at the PREMISES. Moreover, a comparison of the photograph on the DANIEL CLARK's Driver's License used to open the UPS Box, to the photograph of the DANIEL CLARK Driver's License in DAVID listing the home address of the PREMISES, revealed they are the same person.

6. Thereafter, on October 25, 2022, law enforcement officers initiated surveillance at the PREMISES, and observed CLARK exit the PREMISES, enter the driver's seat of gray Honda Minivan and go to a United States Post Office located at 4600 SW 34th

Street, Gainesville, FL, 32608 (the “Gainesville Post Office”). At the Gainesville Post Office, CLARK was observed parking directly in front of a USPS blue bin and depositing a large number of USPS flat rate envelopes into the blue bin. Almost immediately thereafter, law enforcement officers retrieved sixty-six USPS flat rate envelopes, sixty of which had a return address of “DIYHOME, 8860 La Terrazza Place, Jacksonville, FL, 32217” (OUTGOING PARCELS A-1 through A-60). A review of the CLEAR database revealed no individual or company named DIYHOME was associated with the return address on OUTGOING PARCELS A-1 through A-60.

7. Thereafter, on November 4, 2022, law enforcement officers made contact with Jane Doe, an individual in Boynton Beach, Florida to whom OUTGOING PARCEL A-1 was addressed. Jane Doe signed a consent form authorizing law enforcement officers to open and search OUTGOING PARCEL A-1. A subsequent search of OUTGOING PARCEL A-1 revealed 30 white rectangular pills, one of which tested positive for presence of cocaine.

8. Then, on November 8, 2022, the Honorable Magistrate Judge Martin A. Fitzpatrick authorized the search of OUTGOING PARCELS A-2 through A-60, see 22-mj-286-MAF (the “Search Warrant”).

9. Thereafter, on November 14, 2022, pursuant to the Search Warrant, law enforcement officers opened OUTGOING PARCELS A-2 through A-60 and, within OUTGOING PARCELS A-2 through A-60, located the following substances: Fentanyl (735.3 grams), Cocaine (383.6 grams), Aspadol (96.2 grams), Benzodiazapine (45 grams), Modafinil (192.6 grams), Tapentadol (153.8 grams), and other pharmaceuticals (49.2 grams). See Attachment A.

CONCLUSION

10. Based on the foregoing, I submit that there is probable cause to believe that the defendant DANIEL CLARK did knowingly and intentionally conspire to distribute, and possess with intent to distribute, one or more controlled substances, which offense involved Schedule I and Schedule II controlled substances including fentanyl, cocaine, and other controlled substances in violation of federal law.

FURTHER YOUR AFFIANT SAITH NAUGHT.



BARRY O. KOPPLIN
TASK FORCE OFFICER, DEA

Sworn and Attested to me by Applicant by Telephone-Facetime per FRCP 4.1.



WILLIAM MATTHEWMAN
UNITED STATES MAGISTRATE JUDGE

December 5, 2022

ATTACHMENT A

PARCEL NUMBER	ADDRESSEE CITY	ADDRESSEE STATE	USPS PRIORITY MAIL NUMBER	DRUG TYPE
A-2	PENSACOLA	FL	9400111206223822710467	COCAINE
A-3	WILMINGTON	NC	9400111206223822718319	PHENTERMINE
A-4	YORK	PA	9400111206223822718241	FENTANYL
A-5	NEW YORK	NY	9400111206223822897397	TAPENTADOL
A-6	ALBUQUERQUE	NM	9400111206223822718401	FENTANYL
A-7	TOOELE	UT	9400111206223822718333	PHENTERMINE
A-8	PASADENA	CA	9400111206223822712393	FENTANYL
A-9	FORSYTH	MO	9400111206223822710184	COCAINE
A-10	YORBA LINDA	CA	9400111206223822897830	MODAFINIL
A-11	SPARTA	MI	9400111206223822712218	FENTANYL
A-12	NORTH HALEDON	NJ	9400111206223822715196	FENTANYL
A-13	ROCHESTER	NY	9400111206223822712355	FENTANYL
A-14	ORLANDO	FL	9400111206223822714090	FENTANYL
A-15	BROOKLYN	NY	9400111206223822712324	FENTANYL
A-16	RESTON	VA	9400111206223822710177	COCAINE
A-17	VAN BUREN TWP	MI	9400111206223822712164	FENTANYL
A-18	DELTA	OH	9400111206223822710092	COCAINE
A-19	HAIKU	HI	9400111206223822718036	COCAINE
A-20	SPOKANE	WA	9400111206223822715158	FENTANYL
A-21	HOUSTON	TX	9400111206223822715066	FENTANYL
A-22	ROHNERT PARK	CA	9400111206223822715035	FENTANYL
A-23	SAN DIEGO	CA	9400111206223822715509	FENTANYL
A-24	KITTERY	ME	9400111206223822710566	FENTANYL
A-25	LEOMA	TN	9400111206223822710504	FENTANYL
A-26	CARROLLTON	TX	9400111206223822715356	FENTANYL
A-27	LANCASTER	CA	9400111206223822714472	MODAFINIL
A-28	COPPELL	TX	9400111206223822715769	TAPENTADOL
A-29	GREAT FALLS	MT	9400111206223822710368	COCAINE
A-30	LOS ANGELES	CA	9400111206223822710573	FENTANYL
A-31	MORENO VALLEY	CA	9400111206223822712676	FENTANYL
A-32	BROOKS	GA	9400111206223822715981	FENTANYL
A-33	TACOMA	WA	9400111206223822715394	FENTANYL
A-34	HARRISBURG	PA	9400111206223822710535	FENTANYL
A-35	BEAVERTON	OR	9400111206223822715967	MODAFINIL
A-36	COLUMBUS	NJ	9400111206223822712416	TAPENTADOL

ATTACHMENT A

PARCEL NUMBER	ADDRESSEE CITY	ADDRESSEE STATE	USPS PRIORITY MAIL NUMBER	DRUG TYPE
A-38	PORTSMOUTH	VA	9400111206223822710344	COCAINE
A-39	AMES	IA	9400111206223822718722	FENTANYL
A-40	LOOMIS	CA	9400111206223822715226	MODAFINIL
A-41	BROOKLYN	NY	9400111206223822718869	FENTANYL
A-42	WAYNE	PA	9400111206223822718258	FENTANYL
A-43	PANAMA CITY BEACH	FL	9400111206223822718838	FENTANYL
A-44	PASADENA	CA	9400111206223822712058	TAPENTADOL
A-45	RUSSELL SPRINGS	KY	9400111206223822715646	FENTANYL
A-46	SAN ANTONIO	TX	9400111206223822898998	TAPENTADOL
A-47	WENTZVILLE	MO	9400111206223822712874	BENZODIAZAPINE
A-48	CAVE CREEK	AZ	9400111206223822718678	FENTANYL
A-49	WILMINGTON	NC	9400111206223822718197	FENTANYL
A-50	REXFORD	NY	9400111206223822718326	COCAINE
A-51	RIVER OAKS	TX	9400111206223822715400	FENTANYL
A-52	KITTERY	ME	9400111206223822710979	MODAFINIL
A-53	BRENTWOOD	CA	9400111206223822718647	FENTANYL
A-54	ENCINITAS	CA	9400111206223822715905	FENTANYL
A-55	SOUTH JORDAN	UT	9400111206223822715479	FENTANYL
A-56	SOMERVILLE	MA	9400111206223822718913	FENTANYL
A-57	HUFFMAN	TX	9400111206223822718043	FENTANYL
A-58	LOS GATOS	CA	9400111206223822718937	FENTANYL
A-59	MIDDLETON	ID	9400111206223822715653	FENTANYL
A-60	YORBA LINDA	CA	9400111206223822714588	MODAFINIL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: **DANIEL CLARK**

Docket No: **22-MJ-8561-WM**

Charge: **TITLE 21, U.S.C., SECTIONS 846 & 841(a)(1)**

Conspiracy to Possess and Distribute Controlled Substances

***Max. Penalty:** **20 Years' Incarceration, 5 years Supervised Release**
\$100 Special Assessment

***Refers only to possible term of incarceration, fines, special assessments, does not include possible restitution, parole terms, or forfeitures that may be applicable.**